3720 DILLON STREET 
BALTIMORE, MARYLAND 21224-5239 (410) 276-1337 FAX: (410) 276-1364
PRESIDENT'S FAX: (410) 276-4197 CABLE: MARPILOT BALTIMORE TELEX: 87-574

September 17, 2002

Docket Management Facility (USCG-2002-12876) - 4 U.S. Department of Transportation Room PL 401 Washington, DC 20590-0001

> Re: Port Access Route Study of Chesapeake Bay Entrance Request for Comments, Federal Register, Vol. 67, No. 144 of July 26, 2002

Dear Sir,

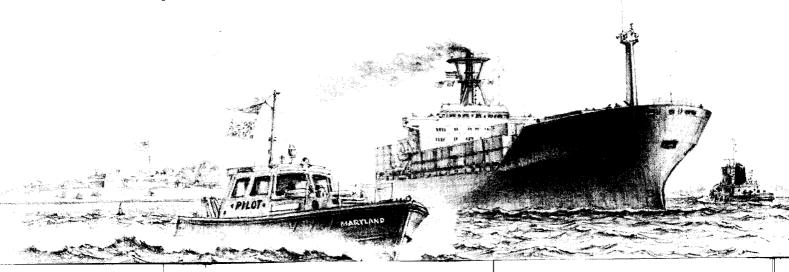
The Association of Maryland Pilots submits the following comments in response to the above mentioned PARS.

## Northeast Approach

The Northeast inbound sealane has shoaled to 28' MLW. The outbound lane has shoaled to 33' MLW. This approach channel should be maintained at 35' MLW. Redirecting the channel due east might be the most cost effective way of achieving this depth.

## Chesapeake Light Tower

Chesapeake Light Tower should be maintained. An early visual reference for inbound traffic is important for safe navigation.



Docket Management Facility September 17, 2002 Page Two

## Southern Approach

A large bulk import terminal in Baltimore has now been deepened to accommodate vessels drawing 46' 06" fresh water, and export coal ships are sailing at 47' 06" draft. These factors, combined with today's larger and deeper containerships will increase the likelihood of vessels meeting in the 1300' wide approach channel. For this reason, a complete review of the Southeast Approach buoyage system may be prudent at this time.

However, if the current buoyage system is maintained, we would like to propose the following suggestions for consideration:

- (a) The deep water route should be maintained at 54' MLW. A recent survey indicates areas of shoaling to 49' MLW.
- (b) Federal regulations state that the buoyed deep water route is restricted to inbound and outbound vessels with drafts exceeding 45' fresh water. We feel this restriction should be adjusted to 42' fresh water. This change is necessary to maintain adequate underkeel clearance for very large vessels when considering their increased draft due to squat, roll, and pitch in this exposed area.

Thank you for the opportunity to comment on this issue.

 $\bigcirc$ 

Captain Eric A. Nielsen

President

Sincerely,